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CLIENT/MATTER NUMBER
012474-0448

March 17, 2020

Via ECF

The Honorable Denise Cote
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007

Re: Encoditech LLC v. Clover Network, Inc.,
Case No.: 1:20-cv-01631-DLC

Dear Judge Cote:

We represent Defendant Clover Network, Inc. ("Clover Network") in the above-referenced action, and we are submitting this letter, pursuant to your local rules, requesting an extension of 30 days to respond to the complaint filed by Plaintiff Encoditech LLC ("Plaintiff"). The current deadline to file a response to the complaint is March 24, 2020. The new proposed deadline would be April 23, 2020. There have been no previous requests by Clover Network for an adjournment of the deadline to respond to the complaint. Clover Network is requesting this extension because the parties are in the midst of negotiations exploring whether a potential resolution of the action can be achieved, and the additional time would allow the parties to complete these negotiations. Plaintiff consents to this adjournment. The adjournment should not affect any other scheduled dates in this matter.

The parties thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Christopher A. DeGennaro
Christopher A. DeGennaro

cc: Isaac Rabicoff
Rabicoff Law LLC
Counsel for Plaintiff (via ECF)

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